

**THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT TACOMA**

RENE L. LARSON and JERROLD A.  
LARSON, WIFE AND HUSBAND,

PLAINTIFFS,

v.

WELLS FARGO BANK, N.A.,

DEFENDANT.

CASE NO. 3:10-cv-05805-RBL

PLAINTIFF'S VERIFIED REPLY

**REPLY**

Plaintiff (s), Rene L. Larson and Jerrold A. Larson, replies to the unverified affirmative defenses filed by defendant, WELLS FARGO BANK, N.A. while reserving the right to move the Court for default judgment against the Defendant, WELLS FARGO BANK, N.A., for failure to return a verified, point for point, answer sworn under penalties of perjury by an officer of public record for the Defendant, WELLS FARGO BANK, N.A., in answer to Plaintiff(s) verified complaint, sworn under penalties of perjury, as required; with said reservations, Plaintiff states as follows with regard to each:

1. Plaintiff denies the first affirmative defense and demands strict proof.



10-CV-05805-RPLY

Rene and Jerrold Larson, Plaintiff(s)  
532 E. Stonecreek Dr.  
La Center, WA 98629

- 1        2. Plaintiff denies the second affirmative defense and demands strict proof.
- 2        3. Plaintiff denies the third affirmative defense and demands strict proof.
- 3        4. Plaintiff denies the fourth affirmative defense and demands strict proof.
- 4        5. Plaintiff denies the fifth affirmative defense and demands strict proof.
- 5        6. Plaintiff denies the sixth affirmative defense and demands strict proof.
- 6        7. Plaintiff denies the seventh affirmative defense and demands strict proof.
- 7        8. Plaintiff denies the eighth affirmative defense and demands strict proof.
- 8        9. Plaintiff denies the ninth affirmative defense and demands strict proof.
- 9        10. Plaintiff denies the tenth affirmative defense and demands strict proof.
- 10       11. Plaintiff denies the eleventh affirmative defense and demands strict proof.
- 11       12. Plaintiff denies the twelfth affirmative defense and demands strict proof.
- 12       13. Plaintiff denies the thirteenth affirmative defense and demands strict proof.
- 13       14. Plaintiff denies the fourteenth affirmative defense and demands strict proof.
- 14       15. Plaintiff denies the fifteenth affirmative defense and demands strict proof.
- 15       16. Plaintiff denies the Sixteenth affirmative defense and demands strict proof.

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PLAINTIFF'S VERIFIED REPLY

**Rene and Jerrold Larson, Plaintiff(s)**  
**532 E. Stonecreek Dr.**  
**La Center, WA 98629**

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## VERIFICATION

I, the under signed Plaintiff(s)/Affiant(s), do affirm the foregoing contents to be true, correct, complete, to the best of my knowledge, information and belief.

Dated: **December 7<sup>th</sup>**, 2010.

FOR: RENE L. LARSON, PLAINTIFF

BY: Rene L. Larson

FOR: JERROLD A LARSON, PLAINTIFF

BY: Jerrold A. Larson

### JURAT

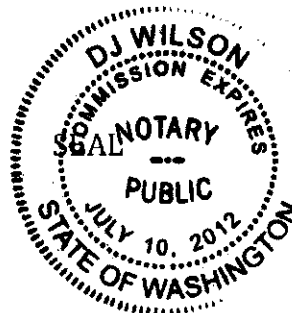
I DJ Wilson a Notary Public certify that I know or have satisfactory evidence that **RENE L. LARSON AND JERROLD A LARSON** appeared before me, and signed this instrument and acknowledged it to be free and voluntary act for the uses and purposes mentioned in the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of Washington, County of King that the foregoing paragraph is true and correct.

12/7/10  
DATED:

DJ Wilson  
Notary Public

My appointment expires 7/10/12



PLAINTIFF'S VERIFIED REPLY

**Rene and Jerrold Larson, Plaintiff(s)**  
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La Center, WA 98629